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March 26, 2024

**VIA CM/ECF**

Honorable Edward S. Kiel, U.S.D.J.  
Mitchell H. Cohen Bldg.  
U.S. Courthouse-4<sup>th</sup> & Cooper Streets.  
Camden, New Jersey 08101

**Re: C.V. v. Carminucci**  
**Civil Docket No.: 2:24-cv-02096-JXN-ESX**

Dear Judge Kiel,

This office represents the Defendant, Lauren Carminucci, in connection with the above-referenced matter. Currently the Plaintiff has filed a Motion for Protective Order, which is currently returnable on April 1, 2024.

This office was just recently retained within the last week. As such, I respectfully request that the Court **adjourn the pending motion to April 15, 2024**, to allow our office to respond accordingly. My **opposition on behalf of the Defendant, Lauren Carminucci, will be due on April 1, 2024, and Plaintiff's Reply, if any, would be due on April 8, 2024.**

I thank Your Honor in advance for your attention to this matter.

Respectfully submitted,  
FUSCO & MACALUSO, P.C.  
*/s/ David T. Ercolano, Esquire*  
DAVID T. ERCOLANO

DTE/als  
cc: All Counsel of Record

**So Ordered.**

/s/ Edward S. Kiel  
**Edward S. Kiel, U.S.D.J.**  
**Date: March 27, 2024**